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Attorneys for Plaintiff,

Adrian Alcaraz

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

<p>Adrian Alcaraz,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>Bank of America, N.A.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No.: 2:17-cv-01217-DMG-AJW</p> <p>NOTICE OF JOINT STIPULATION FOR DISMISSAL OF ACTION WITHOUT PREJUDICE</p> <p>HON. DOLLY M. GEE</p>
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Plaintiff ADRIAN ALCARAZ (hereinafter “Plaintiff”), Defendant BANK OF AMERICA, N.A., (hereinafter “Defendant”), (all jointly hereinafter referred to as “the Parties”), hereby move to dismiss the above entitled action without prejudice, and in support of this motion hereby state:

1. The Parties have reached a settlement in this action;
2. The Parties to the litigation have entered into this Joint Motion.

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3. The Defendant, without acknowledging liability or wrongdoing, and Plaintiff, without acknowledging liability or wrongdoing, have agreed to fully and completely settle this matter;
4. The settlement between Plaintiff and Defendant is memorialized in a written settlement agreement, and has been executed by Plaintiff and Defendant;
5. The Parties agree that this Court can proceed to dismiss this action entirely without prejudice.
6. Once the terms of the settlement have been performed, the parties will file a joint motion for dismissal with prejudice. The court retains the jurisdiction to enforce the terms of the settlement.

WHEREFORE, the Parties respectfully request that this Court dismiss this action without prejudice.

Dated: January 30, 2018

HYDE & SWIGART

By: s/Veronica E. McKnight
Veronica E. McKnight
Attorney for Plaintiff

Dated: January 30, 2018

MCGUIREWOODS LLP

By: s/ Ethan Schatz
Ethan Schatz
Attorney for Defendant

Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Ethan Schatz, counsel for the Defendant, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: January 30, 2018

HYDE & SWIGART

By: s/Veronica E. McKnight
Veronica E. McKnight
Attorney for Plaintiff

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